

FILED

OCT 11 2018

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CLINTON STRANGE,

Plaintiff

6:18-CV-00180-ADA-JCM

v.

GLOBAL VIRTUAL OPPORTUNITIES, INC.,

Defendant

PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT

Preliminary Statement:

Pro Se Plaintiff Clinton Strange hereby moves, pursuant to Federal Rule of Civil Procedure 55(a), for entry of Default by the Clerk for the United States District Court for the Western District of Texas as to Defendant GLOBAL VIRTUAL OPPORTUNITIES, INC. on the basis that Defendant failed to serve a response to Plaintiff's complaint within the time permitted under Federal Rule of Civil Procedure 12(a), and Defendant has not otherwise appeared in this action.

Factual Statements Regarding Lawful Service of Summons and Complaint:

1. Plaintiff filed his complaint over-the-counter "otc" with the U.S. District Clerk's office in the Waco, Texas Division on July 3, 2018. [ECF No.7].
2. On September 6, 2018 at 10:18am CST a Deputy U.S. Marshall served an individual named M. Diaz the summons and complaint at the address of the Defendant's registered agent. [ECF No. 8].
3. The Deadline for a response by the Defendant to the Summons and Complaint was September 27, 2018. [ECF No.8].
4. Defendant has failed to respond to the summons and complaint that Plaintiff caused to be served upon Defendant's registered agent by the U.S. Marshall

Service on September 6, 2018 at 10:18am CST. Defendant has not filed any response to the Plaintiff's complaint, Defendant has not entered an appearance in this matter, nor has Defendant sought additional time within which to respond or otherwise appear in this action *See Declaration of Clinton Strange attached as Exhibit A.*

5. Under Federal Rule of Civil Procedure 55(a), “[w]hen a party against whom a judgement for affirmative relief is sought has failed to plead or otherwise defend and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”
6. Accordingly, the Plaintiff respectfully requests that the Clerk enter default against Defendant.
7. The Defendant’s Registered agent resigned on September 18, 2018. Plaintiff as of the date of this filing has no listed registered agent to serve copies of court filings on aside from the Defendant, and the Texas Secretary of State *See Exhibit B.*

8. WHEREFORE, Plaintiff prays that the Clerk will enter a judgement of Default against the Defendant.

Respectfully Submitted,

X Clinton Strange

Clinton Strange
Pro Se
7021 Winburn Drive
Greenwood, LA 71033
318-423-5057
parsmllc@gmail.com

10-9-2018

Dated

Certificate of Service:

1. I, Clinton Strange, hereby certify that I have served upon the Defendant and The Texas Secretary of State a copy of this court filing styled as "**PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT**".

2. The mailings were addressed to:

Office of the Secretary of State

Corporations Section

P.O. Box 13697

Austin, TX 78711-3697

&

Global Virtual Opportunities, Inc.

6701 Guada Coma Drive

Schertz, TX 78154

3. The mailings were deposited in the U.S. Mail on 10-9-2018.

4. Under the pains and penalties of perjury of the laws of the United States of America I, Clinton Strange, declare that the above statements are both true and correct.

X Clinton Strange

Clinton Strange

10-9-2018

Dated

Pro Se

7021 Winburn Drive

Greenwood, LA 71033

318-423-5057

parsmllc@gmail.com

7021 Winburn Drive
Greenwood, LA 71033

Texas Secretary of State
Corporations Section
PO Box 13697
Austin, TX 78711-3697

78711-3697

Clinton Strange
7021 Winburn Dr.
Greenwood, LA 71033

Global Virtual Opportunities, Inc.
6701 Guadalupe Drive
Schertz, TX 78154



EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CLINTON STRANGE,
Plaintiff

6:18-CV-00180-ADA-JCM

v.

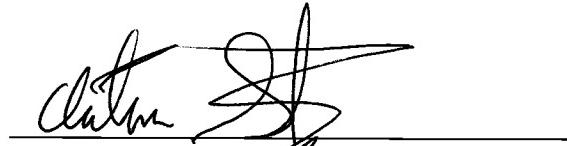
GLOBAL VIRTUAL OPPORTUNITIES, INC.,
Defendant

PLAINTIFF'S DECLARATION IN SUPPORT OF PLAINTIFF'S
MOTION FOR CLERK'S ENTRY OF DEFAULT

I, Clinton Strange, under penalty of perjury, state as follows:

1. I am over the age of 18, and as the Self Represented Plaintiff in this action have personal knowledge of all facts set forth in this Declaration.
2. I am familiar with the file, records, and pleadings in this matter.
3. The summons and complaint in this action were served upon the Defendant September 6, 2018. [ECF No. 8].
4. Pursuant to Federal Rule of Civil Procedure 12(a), Defendant was required to respond to the complaint on or before September 27, 2018. [ECF No.8].
5. Defendant has not entered an appearance to this matter, Defendant has not served a response within the time allowed by law, and Defendant has not sought additional time within which to respond or otherwise appear in this action.

I, Clinton Strange, declare under penalty of perjury that the facts stated herein are true and correct.



Clinton Strange

October 8th, 2018.

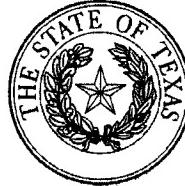
Dated

Notary: Delene O'Dear
Date: October 8, 2018
#065476

page 2 of 2

EXHIBIT B

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



Rolando B. Pablos
Secretary of State

Office of the Secretary of State

CERTIFICATE OF FILING OF

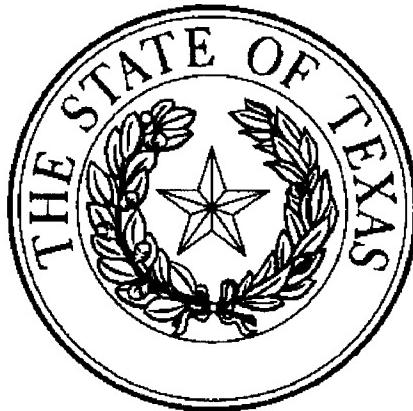
GLOBAL VIRTUAL OPPORTUNITIES, INC.
File Number: 800830111

The undersigned, as Secretary of State of Texas, hereby certifies that the Resignation of Registered Agent for the above named entity has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

Dated: 09/18/2018

Effective: 09/18/2018



A handwritten signature in black ink, appearing to read "RBP".

Rolando B. Pablos
Secretary of State

Come visit us on the internet at <http://www.sos.state.tx.us/>

Phone: (512) 463-5555

Prepared by: Kasey Gunderson

Fax: (512) 463-5709

TID: 10307

Dial: 7-1-1 for Relay Services

Document: 837730540002

TEXAS SECRETARY OF STATE

ROLANDO PABLOS

[Main Site](#)[News](#)[Site Index](#)[Help](#)[Contacts](#)

Business Filing Tracker (submitted last 30 days)

Turnaround Times

Documents will appear on the filing status list once they have been entered into the system. For documents submitted by mail, fax, or personal delivery, it generally takes at least one business day from the time a document has been submitted to the office for the document to be entered into the system and show a status of Received.

All or part of
Entity Name:

Global Virtual Opportunities, li

Click the View link to see the certificate or rejection notice. Please note that some documents may not yet be available for viewing. Clicking on a 'VIEW' link will open a new window that displays a PDF document.

View	Document Number	Entity Name	Delivery Method	Expedited?	Received	Document Type	Status	Filing Number
view	837730540002	GLOBAL VIRTUAL OPPORTUNITIES, INC.	Mail	Yes	09/18/2018	Resignation of Registered Agent	Filed	800830111
view	839779610008	GLOBAL VIRTUAL OPPORTUNITIES, INC.	Mail		09/27/2018	Delivery Notice of Certified Mail	Filed	800830111

[Main Site](#) | [Texas.gov](#) | [Trail](#) | [Texas Homeland Security](#)

[Compact With Texans](#) | [Open Records Policy](#) | [Privacy Policy](#) | [Accessibility Policy](#) | [Link Policy](#) | [Disclaimer](#)

Send comments and questions about the web site to: webmaster@sos.state.tx.us

TEXAS SECRETARY OF STATE

ROLANDO PABLOS

[Retrieve PDF](#)

The document could not be retrieved from storage. Please try again later.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CLINTON STRANGE,

Plaintiff

6:18-CV-00180-ADA-JCM

v.

GLOBAL VIRTUAL OPPORTUNITIES, INC.,

Defendant

[PROPOSED] ORDER ON CLERK'S ENTRY OF DEFAULT
AND MOTION FOR FINAL DEFAULT JUDGMENT

THE COURT has reviewed the pertinent portions of the record and is otherwise fully advised in the premises. On September 6, 2018, Defendant was served. Defendant's response to Plaintiff's Complaint was due on September 27, 2018. However, as of October 9, 2018, Defendant has failed to respond to Plaintiff's Complaint and, in fact, has failed to file an appearance in this case. Accordingly, it is

ORDERED AND ADJUDGED that the Clerk of Court SHALL enter Clerk's Entry of Default against Defendant. It is further

ORDERED AND ADJUDGED that Plaintiff SHALL file a Motion for Final Default Judgment with respect to Defendant, in writing, duly supported by affidavits and other documentation and a proposed final order, by _____, 2018. Plaintiff SHALL

serve the Motion on Defendant to the extent required by Rule 55. Failure to file a Motion for Final Default Judgment, which complies with the requirements of this Order, by

_____, 2018, will result in dismissal of Plaintiff's claims against Defendant.

**DONE AND ORDERED in Chambers at _____, Texas this
_____, 2018.**

Judge _____

UNITED STATES _____ JUDGE

Clinton Strange

7021 Winburn Drive

Greenwood, LA 71033



1000

76701

U.S. POSTAGE PAID
FROM GREENWOOD,
LA 71033
OCT 09 18
AMOUNT
\$1.63
R2305H128624-03



CLERK
United States District Court
800 Franklin Avenue Room 380
Waco, TX 76701